

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

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In Re: ) Case No. 19-30088  
 ) Chapter 11  
PG&E CORPORATION AND PACIFIC )  
GAS AND ELECTRIC COMPANY, ) San Francisco, California  
 ) Tuesday, October 11, 2022  
Reorganized Debtors. ) 10:00 AM  
 )  
REORGANIZED DEBTORS'  
OBJECTION TO PROOF OF CLAIM  
NO. 2090 FILED BY AMIR  
SHAHMIRZA FILED BY PG&E  
CORPORATION [12130]

TRANSCRIPT OF PROCEEDINGS  
BEFORE THE HONORABLE DENNIS MONTALI  
UNITED STATES BANKRUPTCY JUDGE

APPEARANCES (All present by video or telephone):  
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SAN FRANCISCO, CALIFORNIA, TUESDAY, OCTOBER 11, 2022, 10:00 AM

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(Call to order of the Court.)

THE CLERK: Court is now in session, the Honorable  
Dennis Montali presiding. Calling the matter of PG&E  
Corporation.

THE COURT: Good morning. Who's appearing for PG&E  
today, please?

MR. RUPP: Good morning, Your Honor. Thomas Rupp of  
Keller Benvenuti Kim for the reorganized debtors.

THE COURT: And appearing for the claimant?

MR. JACOBSON: Lawrence Jacobson. Good morning, Your  
Honor.

THE COURT: Good morning, Mr. Jacobson.

MR. RUPP: Your Honor, I think we have one more --

MR. LAMB: Good morning --

MR. RUPP: -- appearance for PG&E.

MR. LAMB: Good morning, Your Honor. This is Steven  
Lamb on behalf of PG&E also.

THE COURT: All right. So Mr. Jacobson, I just didn't  
see your name on the call. I saw some unidentified guest.

MR. JACOBSON: Judge, I tried to log on through the  
computer, and I think I was following instructions correctly  
and it kept telling me my credentials were not correct.

THE COURT: Yeah. I had some problems today, too, so

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1 maybe it was AT&T's fault.

2 Well, look, there are a bunch of things that are  
3 confusing about the way the papers are submitted because Mr.  
4 Jacobson, this is a claim objection, and you're asking for  
5 relief from stay and abstention. And there are no motions for  
6 either.

7 Mr. Rupp or Mr. Lamb, I'm confused from your point of  
8 view because you say I could dispose of this because there are  
9 no facts in dispute, but then you say some limited discovery is  
10 necessary.

11 So let me just clarify a couple of things, and then  
12 I'll hear from both sides. From my reviewing of the papers, it  
13 doesn't seem to be an issue as to the lines that go across the  
14 property and whether the lines -- towers on the power lines,  
15 but rather whether PG&E violated the claimant's rights --  
16 whomever the claimant is -- the claimant's rights by lowering  
17 the level of the power lines at some point later on. And I  
18 don't see any discussion in the papers about that.

19 So I'm kind of confused about where we go from here.  
20 Why don't I let you start, Mr. Jacobson? You are the claimant.  
21 So what's your position today, and what do you think I ought to  
22 do? And --

23 MR. JACOBSON: Thank you.

24 THE COURT: -- don't tell me you think I ought to -- I  
25 ought to abstain or grant relief from stay because you haven't

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asked for either one of those properly.

MR. JACOBSON: Well, thank you. Well, let me start  
with the bigger picture and then come to that last point.

There was an event in 2018 that related to the  
lowering of the lines, as you articulated. There had been  
smaller-based towers on the adjacent properties at either end  
that were at a height. And in 2018, with no communication, no  
permission, no granted authority, PG&E installed massively  
larger towers and bigger lines and lowered them across the  
property, affecting the use and the value.

The claimant's state court counsel promptly filed a  
complaint based upon the set of facts that was known at that  
point from his pleading perspective. That circumstance caused  
the claimant to procure the record of survey by which the  
surveyor, who is an expert, examined the entire chain of title  
and concluded that there are no easement rights of record at  
all, not just at a height, but at all.

So that then raises the current issue, are there any  
easement rights at all, are there easement rights under some  
legal theory at a particular higher height, and whether there  
is some form of prescriptive use entitlement, as PG&E seems to  
argue.

And it's also confusing from a timing standpoint  
because the complaint was filed in 2018. PG&E demurred to that  
complaint in early 2019 and then after the filing of the

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1 petition, gave notice to the state court and parties about the  
2 filing and then took the additional act of withdrawing the  
3 hearing on the demurrer.

4 THE COURT: Yeah, but that's all procedural history  
5 that's of no particular relevance today. I mean, your --

6 MR. JACOBSON: Well, I (indiscernible) --

7 THE COURT: as to -- well, your recital as to what  
8 happened in 2018 obviously is critical, but well, I mean, we're  
9 back to my point. Today, I have to decide whether to act on a  
10 claim objection -- well, let's clarify one thing.

11 Your surveyor says there were no easements of records,  
12 and yet the plat map that's in the record shows two recorded  
13 easements in 1923. No one has presented me with those actual  
14 easements, but do you think those don't exist, Mr. Jacobson?

15 MR. JACOBSON: Yes, I do think that.

16 THE COURT: They don't exist?

17 MR. JACOBSON: (Indiscernible) yeah.

18 THE COURT: Where did they go? Where did they go?  
19 Are they still of record?

20 MR. JACOBSON: Well, there are at least two issues  
21 about that. One is the surveyor, Mahoney (phonetic), indicates  
22 that they are in the approximate area of this property, but  
23 it's an area of fill, it's an area of change, and his statement  
24 is that you can't locate wherever that easement would be, other  
25 than that the City of San Francisco, I think in 2000 or so, did

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1 its record of survey that shows the transmission lines on an  
2 adjacent property. So the first point is, whatever those  
3 easements were back then, they can't be identified as to a  
4 location.

5 And then if you read Mahoney's report, that August  
6 11th report that is pages 4 through 8 of that compendium, he  
7 explains that there was a history of conveyances between the  
8 City of San Francisco and the State of California, and that the  
9 easements were extinguished or relocated by reason of the  
10 conveyances and the ordinance and that the deed from the  
11 claimant's predecessor -- the deed to the claimant's  
12 predecessor was a director's deed.

13 And a director's deed, by definition, describes what  
14 is and isn't being conveyed and what rights exist or interests  
15 have been asserted against the property. And the director's  
16 deed by which the claimant's predecessor and the claimant took  
17 title have no easements, not the 1923 ones or any other ones,  
18 except for a sliver up at the end for landscaping of something  
19 that's now paved. So (indiscernible) --

20 THE COURT: But your client doesn't dispute -- wait,  
21 he doesn't dispute that the lines crossed the property when he  
22 bought the property, did he?

23 MR. JACOBSON: That's correct.

24 THE COURT: And if you and I were out there at the  
25 corner of 101 and 2380 (phonetic), I bet we'd see those lines.

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1 So --

2 MR. JACOBSON: We sure would.

3 THE COURT: -- are you saying that the lines should be  
4 removed or that your client should be provided damages if the  
5 lines were improperly lowered or both?

6 MR. JACOBSON: Both. Well, or any alternative. They  
7 can move them, or they can compensate for them. They shouldn't  
8 be there. And the surveyor will testify that --

9 THE COURT: But Mr. Davidson (sic), he bought the  
10 property with them there over the property. Right. You just  
11 have --

12 MR. JACOBSON: Well --

13 THE COURT: -- stated that point, didn't you?

14 MR. JACOBSON: -- but that goes back to what is the  
15 effect of that? If they had no entitlement to be there in the  
16 first place, what is the legal fact, the fact that they were  
17 there when he bought it. And then they (indiscernible) --

18 THE COURT: Well, what if they were there -- well,  
19 you're back to prescriptive easement, that they may have been  
20 there for sixty years, whether or not there was an easement of  
21 record.

22 MR. JACOBSON: And then it gets you to the -- so what  
23 is the easement, where is it located, and is it for the lines  
24 that were maintained at the height that existed in your sixty-  
25 year (indiscernible) --



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1 THE COURT: I understand. I understand the height  
2 issue. To me, it's a more -- it's a very discreet question of  
3 the height issue. But last question for you, and then I want  
4 to hear from Mr. Lamb or Mr. Rupp.

5 There's a lot of paper being spent on who the claimant  
6 is. Why isn't your corporate client substituted in as the  
7 claimant here? Do I suspect that maybe he doesn't want to pay  
8 the State Board of Equalization to reinstate a license? I  
9 mean, what is the big issue here of who the claimant is?

10 MR. JACOBSON: If that's a question to me --

11 THE COURT: Yeah, it is to you because --

12 MR. JACOBSON: Oh, yeah --

13 THE COURT: -- one argument would be you don't have  
14 a -- your individual client doesn't have a claim.

15 MR. JACOBSON: Well, he's here as the agent of the  
16 entity that is disclosed in the --

17 THE COURT: But I know that. I know he's an agent,  
18 but that doesn't make him the claimant. So why is there an  
19 argument about who the claimant is?

20 MR. JACOBSON: I would be pleased to file an amended  
21 claim only in the name of the corporation. And there's no  
22 suspension issue. There's no franchise tax board issue.

23 THE COURT: Okay. Well, then why didn't you?

24 MR. JACOBSON: It just (indiscernible) caught up in  
25 this objection, and that's one of the things I'd like to be

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1 allowed to do.

2 THE COURT: Okay. But again, there's nothing in the  
3 papers that say that.

4 All right. Mr. Lamb or Mr. Rupp, what do you think I  
5 should do today?

6 MR. LAMB: This is Steve Lamb, Your Honor. Thank you  
7 for your time.

8 And I think that the Court is absolutely correct  
9 regarding the party. We've addressed that. I don't think we  
10 need to address that any further.

11 I would just point out that we had a claim, and then  
12 we asked for an information request. And in docket number  
13 12131-4, there's a response, and it's Mahoney's report, not the  
14 survey, but the report. And in that report, he refers to this  
15 ordinance 3975 that Mr. Jacobson has referred to. And  
16 according to that report, it lists a series of easements. And  
17 as the Court noted, it identifies a plat map that clearly  
18 reflects those easements.

19 And Mahoney's position in response to the report is,  
20 well, those easements have been relocated or extinguished, and  
21 he relies on 3975. We got a copy of that in the information  
22 request response. It did not include a legible copy of 3975.  
23 So we obtained it, and in response, we filed our objection.  
24 And the objection lists that, together with my declaration,  
25 which provides a legible copy and clearly states that that's

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1 not what the ordinance says, that they weren't relocated or  
2 extinguished in any way.

3 So from our position, what happens now is Mr. Mahoney  
4 submits a subsequent declaration which says, well, I've looked  
5 at this record of survey again, and it doesn't show any  
6 easements. He doesn't really address ordinance 3975. He  
7 doesn't address the initial statement of claim. He just  
8 changes positions. And we believe that they're judicially  
9 estopped from that and so have already submitted this position  
10 and haven't really responded, Your Honor.

11 So that's what we're faced with, in addition to the  
12 fact that all this record of survey discussion is largely  
13 irrelevant because it doesn't have any legal impact. Is there  
14 an easement, and Mahoney's clearly identified them. He's  
15 attached them. They're part of the record. His position is  
16 they've been relocated or extinguished.

17 When I pointed out that that's, in fact, not the case,  
18 they really don't address that. They just change position and  
19 say, well, we've taken another look, and there's no easement.  
20 And that doesn't really address it, Your Honor.

21 THE COURT: Okay. Okay. But what about the lowering?  
22 Lowering is not a --

23 MR. LAMB: Well, the lowering --

24 THE COURT: -- a relocation.

25 MR. LAMB: Sure. The lowering issue occurred quite

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1 some time earlier, and what happened in that regard was they  
2 tried to say that it was too low. And we said, no, actually,  
3 there's a general order that says it is the appropriate height.  
4 So they really haven't addressed that. Now, they changed  
5 position to say, well, they should have been there in the first  
6 place.

7 What they started with saying was they were there, and  
8 they were too low. We responded and said they're not too low.  
9 And then they said, well, they're not there in the first place.  
10 And then they said, well, I think they're there, but there's  
11 this 3975 ordinance, so they've been relocated or and  
12 extinguished.

13 So we provided them a copy of that. We showed that's  
14 not the case. And now they came back with another declaration  
15 that says, well, we've looked again, and they're not there.

16 THE COURT: Okay. Why don't you make a motion for  
17 summary judgment? I mean, if you're confident that you can  
18 prove the case with competent evidence, we can take -- we can  
19 do --

20 MR. LAMB: Yeah.

21 THE COURT: -- a motion for summary judgment on claim.  
22 I mean, Mr. Lamb --

23 MR. LAMB: Well, Your Honor, we have --

24 THE COURT: -- I don't know if you're -- well, wait a  
25 minute.

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1 MR. LAMB: -- we have to -- we have to --

2 THE COURT: I don't know if you're familiar with the  
3 procedures on the claim objection, but we have in dispute under  
4 the local rules whether I can dispose of it on a matter of law.  
5 And to me, there's enough to be concerned about that I could  
6 say, well, if you're right, make a motion for summary judgment.  
7 And if you do, then you can deal with -- and let's assume that  
8 we're not going to get bogged down on who the actual claimant  
9 is.

10 MR. LAMB: Sure.

11 THE COURT: It's either the corporation or its owner.  
12 And if you're right, you'll win. And if you're wrong, then  
13 it'll either have to be resolved in a traditional fact dispute  
14 case, either by this Court or maybe it would be appropriate to  
15 send it back to state court.

16 But I mean, is there any reason why you couldn't put  
17 it together as a motion for summary judgment?

18 MR. LAMB: Well, absolutely not. But my  
19 understanding --

20 THE COURT: Okay.

21 MR. LAMB: -- Your Honor -- I think that that could be  
22 done, and I am not a bankruptcy counsel, so I rely on Mr. Rupp.  
23 But frankly, my understanding is that what happens here is once  
24 you do the objection, the burden shifts, and they have to  
25 present something. And they didn't present anything. They

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1 really didn't.

2 THE COURT: Well --

3 MR. LAMB: They didn't really respond.

4 THE COURT: Okay. But if I tell him -- but leave  
5 aside burden of proof because if Mr. Jacobson says we're  
6 ready and we're prepared to prove our case at a trial because  
7 there are facts in dispute, then your response to that is there  
8 are no material facts in dispute. I can win by summary  
9 judgment.

10 I don't want to waste everybody's time, yours and mine  
11 included, on a motion for summary judgment that was doomed to  
12 fail because there are material facts in dispute. But based  
13 upon your recitation and your --

14 MR. LAMB: Okay.

15 THE COURT: -- and I didn't take the time to parse out  
16 Mr. Mahoney's statement or -- I mean, I started with where the  
17 hell is the easement? Mr. Rupp is familiar with the fact that  
18 I have another matter pending in our court involving a great,  
19 big, powerful, high power line across somebody's home. And  
20 we're going to perhaps go to trial on that subject.

21 And so I'm familiar with the doctrine, but I am used  
22 to looking at the easements. And if I had a declaration that  
23 says, here's the easement and it hasn't been reconveyed, then  
24 it'll be up to Mr. Jacobson to rebut that.

25 Anyway. Well, Mr. Lamb, leave aside the question of

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1 whether you should make that motion. What do you think I  
2 should do today?

3 MR. LAMB: Well, our position is you should sustain  
4 the objection because they haven't met their burden and it  
5 hasn't been shifted, and I don't think it's appropriate to  
6 simply submit another declaration which is inconsistent with  
7 the prior one without addressing it. I don't think that that's  
8 consistent with the Plice v. Crone (phonetic) case that we  
9 cited.

10 But I do understand your argument regarding summary  
11 judgment. I think it's a question, though, of whether or not  
12 procedurally we've gotten to the point where we need to do  
13 that. And I don't think we can.

14 THE COURT: Okay. Okay. Mr. Jacobson.

15 MR. JACOBSON: Yeah. Judge, I would just comment,  
16 generally and preliminarily, that that was not an accurate  
17 assessment of Mr. Mahony's position or the positions of the  
18 claimant. There has never been a change in position. He's  
19 been perfectly consistent. He expressed the same conclusion  
20 he's expressing now in his report of August 11 of 2018.

21 It's a five-page analysis of the San Francisco  
22 ordinance, the chain of title, all the ten or twelve documents  
23 involved in that process, and it supports his conclusion that  
24 is stated in his declaration at paragraphs 13, 14, 15, and 16  
25 of PG&E does not hold any easements of record or traceable

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1 through recorded documents for transmission across the power  
2 line -- across the property --

3 THE COURT: That does sound like a legal conclusion.  
4 That does sound like a legal --

5 MR. JACOBSON: Well --

6 THE COURT: -- conclusion by a surveyor. I mean,  
7 surveyors aren't --

8 MR. JACOBSON: Well, he's a --

9 THE COURT: -- qualified to give legal conclusions,  
10 are they?

11 MR. JACOBSON: He has an expertise in analyzing these  
12 documents from a surveyor's perspective as to where are the  
13 boundaries and what are the interests of record on it. So it  
14 is consistent with his expertise. And the process with the  
15 record of survey is that it's prepared by the surveyor and then  
16 presented to the county (audio interference) --

17 (Off the record due to technical issues.)

18 THE COURT: So somehow the recording stopped while you  
19 were talking.

20 Well, I mean, I think it's a stretch to have a  
21 surveyor, as qualified as he may be, to opine on the ultimate  
22 question that there is no easement of record -- I mean, no  
23 enforceable easement, when that's a leap. But if I set --

24 MR. JACOBSON: Well, the one thing --

25 THE COURT: -- this for trial -- if I set this for



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1 trial --

2 MR. JACOBSON: One thing that --

3 THE COURT: -- would he be -- wait, if I set this --

4 MR. JACOBSON: Sorry.

5 THE COURT: -- for trial, would he be your witness?

6 MR. JACOBSON: He will be a witness --

7 THE COURT: He would be your --

8 MR. JACOBSON: -- yes.

9 THE COURT: Would he be your expert witness on the  
10 subject?

11 MR. JACOBSON: Yes.

12 THE COURT: Well, okay.

13 MR. JACOBSON: He will take you through the entire  
14 process of what surveying involves, what they do to identify,  
15 and how it's reviewed and approved by the county.

16 But I want to say one thing I think is really  
17 important and missing here is all of the information in front  
18 of you has come from the claimant. In terms of where the hell  
19 is the easement, PG&E has never produced anything that shows  
20 any easement located where these power lines are.

21 And they have got no diagrams. They've got no maps.  
22 They've got no records of survey. All they do is look at  
23 something from 1923 with no history, no analysis, and say you  
24 should grant summary judgment at this status conference. It is  
25 complicated --

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1 THE COURT: Well, I understand, but then I'll put the  
2 question to you. What if I told you to make a motion for  
3 summary judgment? You believe you could make one? In other  
4 words, you believe that, with no material facts in dispute, you  
5 can make a prima facie case and carry a burden that you have --  
6 and leaving aside perhaps the measure of damages.

7 But your position seems to be that your client --  
8 again, we'll leave aside which client -- one of your clients --  
9 your client owns the property, and if you are standing on that  
10 property, you'd see towers and powerlines across the property.  
11 And your view is they don't belong there, and you're entitled  
12 to damages. And you can make the case? No material facts in  
13 dispute, you believe?

14 MR. JACOBSON: Correct. On that legal issue, I agree,  
15 I can make a motion for summary judgment. I do want -- the  
16 reason I was giving you the state court history is because that  
17 complaint was filed since 2018. There's been a --

18 THE COURT: No, I know.

19 MR. JACOBSON: -- continuing trespass, an additional  
20 trespass, and the procedure in state court, if it were to go  
21 forward there, is that the plaintiff, the claimant, files an  
22 amended complaint to deal with the demurrer issues. Then the  
23 case goes to trial on the amended complaint. So --

24 THE COURT: No, I know that. There's nothing  
25 really -- that's the same as federal practice. I mean, if it

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1 had been a 12(b)(6) motion and withdrawn or amended complaint,  
2 it's the same. I know that.

3 But my point is that it hasn't happened. We know  
4 why -- I mean, I don't know why they actually withdrew the  
5 demurrer, but it was a bankruptcy that stayed the action. And  
6 nobody in three years sought relief from stay. And so here we  
7 are.

8 And to me, procedurally, it's perfectly proper for  
9 your client to file a claim and for the debtor to object to the  
10 claim. And as a matter of discretion whether I ship it back to  
11 state court or not is a different question.

12 MR. JACOBSON: One procedural --

13 THE COURT: Well, I --

14 MR. JACOBSON: -- issue here is that the state court  
15 counsel who filed the proof of claim became physically --

16 THE COURT: No, I understand.

17 MR. JACOBSON: -- (indiscernible) practice.

18 THE COURT: You made that point, but that's not a  
19 procedural issue. That's a personal issue.

20 But Mr. Jacobson, your client has a very capable  
21 lawyer representing him this morning, known to me as very  
22 capable lawyer. And so Mr. Capable Lawyer, you believe you can  
23 make the summary judgment? I think that's what I should tell  
24 you to do. I mean, Mr. Lamb thinks that I should put the  
25 burden on you, and I guess maybe that's true.

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1           And so I guess my question is, well, why don't you  
2 just do that? And I mean, I realize I'm not trying to put your  
3 client to an unnecessary effort or expense, but the fact of the  
4 matter is, if you can do it, you'll get it from me very  
5 quickly, and we don't have to worry about the poor judge that  
6 was the subject of a portion of your argument who is going to  
7 have to deal with it if I send it back to her.

8           So what's your response on that invitation?

9           MR. JACOBSON: To accept it.

10          THE COURT: Okay.

11          MR. JACOBSON: The preferred alternative would be to  
12 go back to state court, amend the complaint, and finish it  
13 where it started. But if the bankruptcy process puts this  
14 issue in the bankruptcy court on the legal issue first, I'm  
15 prepared to make that motion.

16          THE COURT: Mr. Jacobson, again, I have already  
17 complimented you about your skills, but you've had three years  
18 to file a motion for relief from stay, and you didn't. And you  
19 made a very passionate argument in writing and orally and  
20 tucked away at the end is I should get relief from stay. And  
21 you know that's not the way to do it procedurally.

22          So the point is, if you're confident that you can show  
23 as a fact matter that the law is in your favor and there is  
24 some sort of trespass then -- maybe at this Court or maybe it  
25 should be sent out for measuring the damages, I don't know.

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1 I'm not going to decide that because Mr. Lamb thinks he can  
2 beat you on the papers. You think you can beat him on the  
3 papers.

4 So I'm going to -- unless Mr. Lamb or Mr. Rupp have a  
5 contrary view, I'm going to say, okay, let's have a motion from  
6 the claimant. First of all, you and counsel see if you can  
7 meet and confer on the subject of can we agree on who the  
8 claimant is. And if there's no agreement between the two of  
9 you, then the motion (indiscernible) should say who the  
10 claimant is and why the claimant is entitled to it.

11 I'm not going to get bogged down on whether the  
12 corporate entity -- sorry, I forgot the name, but you know who  
13 I'm talking about -- whether it should have filed the proof of  
14 claim. I'll accept that the debtor was on notice as to an  
15 assertion of rights by somebody affiliated with the property  
16 that is the subject of this discussion.

17 When can you file your motion?

18 MR. JACOBSON: I am going to be away the first half of  
19 November.

20 THE COURT: Okay.

21 MR. JACOBSON: Say the first week of -- end of the  
22 first week of December.

23 THE COURT: Okay. Mr. Lamb, any reason why we  
24 shouldn't go that way?

25 MR. LAMB: Well, Your Honor, we've already addressed

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1 the procedural aspect of the objection, but if we're going to  
2 proceed to an evidentiary finding under summary adjudication or  
3 summary judgment, then I don't see any reason to delay it. I  
4 mean, whenever they want to set it that's at the Court's  
5 convenience.

6 I would just suggest that perhaps counsel can propose  
7 a briefing schedule, and I can confer with Mr. Rupp if that's  
8 what we're going to do, if that's what the Court's going to do,  
9 and then we should address it there. That would be my  
10 proposal.

11 THE COURT: Well, remember, again, we're back to  
12 bankruptcy procedure. This extended discussion proves that it  
13 would be improper for me to make a ruling in favor of PG&E on  
14 this record even though you're confident, Mr. Lamb, that  
15 perhaps I could. And I don't feel that it would be faithful to  
16 our procedure when it's clear that there are no facts in  
17 dispute and therefore it's clear as a matter of law that you  
18 should win. For example, here, Mr. Jacobson believes it's well  
19 established that there are facts that are not in dispute that  
20 are in his favor.

21 So the correct thing to do, and it's what we would do  
22 even if there had been no state court suit, I would have said,  
23 okay, let's set it for a trial or summary judgment. And Mr.  
24 Jacobson knows the procedure. And if I had decided to send  
25 this thing back to state court, presumably the same process

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1 would happen.

2 Mr. Lamb, you made a reference to a case called -- you  
3 said Crone (phonetic). I wasn't familiar with the case. And  
4 it doesn't matter what it says. The point is, for the reasons  
5 I've stated, I can't make a ruling in your favor today.

6 And Mr. Jacobson is confident that he can establish as  
7 a matter of law that his client's rights need to be vindicated  
8 and quantified. And all you have to do is show that he doesn't  
9 have any rights to quantify and that the law would come out in  
10 favor of your side and no matter who his claimant is and no  
11 matter what their version of the facts are.

12 And I'm going to accommodate people's personal  
13 schedules, particularly when the matter is complicated like  
14 this. So I'm going to let Mr. Jacobson file a motion for  
15 summary judgment. And our rules have a normal procedure. Mr.  
16 Rupp's quite familiar with the routines of where we set things  
17 on the PG&E calendar.

18 So what I think I'll do is I will give Mr. Jacobson a  
19 deadline to file his motion for summary judgment on the -- and  
20 I guess it's a partial summary judgment -- I'm entitled to  
21 damages to be determined for the following reasons, A, B, C.  
22 Your response would be, you're not entitled to any damages,  
23 therefore your claim should be disallowed, period.

24 And if I tell Mr. Jacobson I'll give you till December  
25 8th to file the motion, then we'll just set it on the regular

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1 calendar for PG&E. I think, Mr. Rupp, you're with me. That  
2 would be in early January, right? Whatever our first January  
3 calendar date would be the normal way to set a motion that was  
4 filed on around December 8th; isn't that correct?

5 MR. RUPP: Yes, Your Honor, that would be early  
6 January. I don't want to speak for either Mr. Jacobson or Mr.  
7 Lamb, who'll be endeavoring to do all this. But it raises the  
8 issue of subsequent briefing coming up right around and through  
9 the holidays. But I think whatever date the Court wants to  
10 set, and if the parties come together and want to agree to make  
11 changes to those dates, the Court's always been very receptive  
12 to that.

13 THE COURT: And I'll do that -- I'll continue to be  
14 that way. Mr. Jacobson's a veteran of my procedure, and he  
15 knows that too. And Mr. Jacobson, I'll let you meet and confer  
16 with Mr. Lamb to talk about an agreed schedule.

17 But why don't we -- why don't we do the following. I  
18 will say that I'd like to have the procedural schedule resolved  
19 by the two counsel, and the tentative process will be a motion  
20 for summary judgment for the claimant to be filed no later than  
21 December 8th.

22 Ms. Parada, what is our next PG&E calendar after  
23 December 8th? Just call that status conference. It's about  
24 the 11th, isn't it? No? Hmm?

25 THE CLERK: One moment, Your Honor. We have December



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1 13th.

2 THE COURT: Okay. So Mr. Jacobson and Mr. Lamb, I  
3 think I'm about to lose my connection here. I'm going to --  
4 I'm going to -- I'm going to just pencil in or put on the  
5 calendar a continued status conference on this claim objection  
6 for December 13th, but my hope is that I never have to do that.  
7 And it's there in case thing gets off track.

8 But on the assumption that a motion is filed by  
9 December 8th, then Mr. Jacobson and Mr. Lamb can work out a  
10 mutually convenient schedule to accommodate their personal  
11 needs, their holiday schedules, and everything else. And it'll  
12 be on our routine and regular law and motion calendar.

13 The December 13th date is just a safety valve in case  
14 this procedural scheduling doesn't work and there's any  
15 disagreement and we're just there. But if we get a motion on  
16 file on and an agreed briefing schedule between counsel, we'll  
17 just cancel that December 13th date. Okay. Everybody clear?

18 MR. JACOBSON: Yes, Your Honor.

19 MR. LAMB: Clear, Your Honor.

20 MR. JACOBSON: This is Jacobson. We've made mutual  
21 accommodations on timing, and I would be confident that we can  
22 make those arrangements.

23 THE COURT: Yeah, that's good. Sounds good to me.

24 Okay. Mr. Lamb, thank you for your time. I'll look  
25 forward --

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1 MR. LAMB: Thank you, Your Honor.

2 THE COURT: -- to hearing from you, and I will  
3 conclude the matter.

4 I'm going to conclude the hearing and -- I can talk to  
5 my staff. Thank you. Thank you for your time, all counsel.

6 MR. JACOBSON: Thank you.

7 MR. LAMB: Thank you, Your Honor.

8 (Whereupon these proceedings were concluded at 10:33 AM)

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## C E R T I F I C A T I O N

I, River Wolfe, certify that the foregoing transcript is a true and accurate record of the proceedings.



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/s/ RIVER WOLFE, CDLT-265

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Date: October 12, 2022

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